



Salt River

PIMA-MARICOPA INDIAN COMMUNITY

ROUTE 1, BOX 216 / SCOTTSDALE, ARIZONA 85256-9722 / PHONE (602) 941-7277

Harry Seraydarian
 Director, Water Management
 U.S. Environmental Protection Agency
 Region IX
 75 Hawthorne Street
 San Francisco, CA 94105-3901

April 14, 1993

Dear Mr Seraydarian:

We received your letter of April 1, 1993 which discussed your concerns and expectations regarding the area of the Salt River adjacent to the SRPMIC Tri-Cities Landfill. We have outlined your issues with our responses below.

Issue - 1 Design strength of protective berm.

SRPMIC contracted Simons Li & Associates to provide a detailed stability and level of protection report in addition to the BRW analysis. This report includes geotechnical investigations of the emergency dike, scour analysis and strength tests. The initial report was submitted to the Community on April 12, 1993 at the monthly project coordination meeting. Copies of the report were furnished to the Corps of Engineers and Flood Control District of Maricopa County at the meeting. The initial hydraulic analysis provided in the report states that the containment dike is marginally stable up to 80,000 cfs. The initial stability analysis provided in the report states that the loss of bank material would be highly probable for discharges exceeding 75,000 cfs.

Issue - 2 Stabilization activities associated with the exposed area.

SRPMIC contracted CH2M HILL to provide the closure design for the existing Tri-Cities Landfill. The closure design will be in accordance with Subtitle D requirements. We realize the importance of the coordination effort between the projects and have scheduled and attended 2 coordination meetings between the consultants to date. We anticipate additional coordination to be on-going as the projects develop.

Issue - 3 Detailed project schedule.

We have attached Simons Li & Associates project schedule. As the project progresses we will receive schedule updates and modifications. The construction CPM will be developed by the contractor upon the award of the contract.

ENTERED

EPA Letter Continued...

Issue - 4 Groundwater investigation.

SRPMIC has an established groundwater monitoring program for the Tri-Cities Landfill. The current program monitors 7 existing wells (5 on-site wells and 2 off-site wells). A groundwater quality report for the Tri-Cities Landfill is prepared for SRPMIC by a Groundwater Quality Consultant annually. The latest report was prepared on June 15, 1992. The 1993 Groundwater Quality Report is forthcoming. The closure design will address all required groundwater monitoring of the existing landfill.

SRPMIC has monthly status meetings with the Corps of Engineers, Flood Control District of Maricopa County, Arizona Department of Environmental Quality and Simons Li & Associates to discuss the project. The next scheduled project meeting is May 10, 1993.

The Salt River Pima-Maricopa Indian Community greatly appreciates the cooperative efforts of Region 9 and the Corps of Engineers. Your cooperation has enabled the Community to continue with a process which will result in a permanent solution to the situation.

If there are any questions or additional information you need, please call Bryan D. Meyers, SRPMIC Project Manager at (602) 941-7346.

Sincerely,

Bryan D. Meyers

Bryan D. Meyers
Planning & Development Services

cc: COL R.L. VanAntwerp, COE
Ron Fowler, COE
Steve Johnson, ADEQ
Nona Bahashone, SRPMIC
SRPMIC Tribal Administration
Richard Wilks

Proposed Work Schedule

[illegible][illegible]

72E10L. 190



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street
San Francisco, Ca. 94105-3901

APR 01 1993

Mr. Ivan Makil, President
Salt River Pima-Maricopa Indian Community
Route 1, Box 216
Scottsdale, AZ 85256

Re: Tri-Cities Landfill

Dear Mr. Makil

The purpose of this letter is to discuss our concerns and expectations regarding the Salt River Pima-Maricopa Indian Community's (SRPMIC) Tri-Cities Landfill (landfill). While the US Army Corps of Engineers (COE) will continue as lead federal agency to oversee the construction of the protective berm and stabilization of the landfill, there are four additional concerns we wish to raise with you.

The first issue is the design strength of the protective berm. Region 9 understands that the SRPMIC has contracted with the Simons Li and Associates (SLA) to complete the final work for this aspect of permanent protection of the landfill. Further, Region 9 understands that the SRPMIC's previous contractor (BRW) has asserted that the emergency berm is "high" enough to protect the landfill from a 170,000 to 180,000 cubic feet per second (cfs) flow rate. While berm elevation may be an important indicator of protection, Region 9 feels that additional design strength tests, such as scour analysis, should be conducted to certify the strength of the protective berm.

Secondly, Region 9 is concerned with the stabilization activities associated with the breached area (exposed face) of the landfill. It is critical that all design and construction stabilization activities take into account the final closure requirements of the revised municipal solid waste landfill criteria (40 CFR 258). Specifically, stabilization activities should be conducted to ensure that final closure requirements of 40 CFR 258.60 are met.

Thirdly, we ask SRPMIC to submit to us a more detailed project schedule, including a construction project management (CPM) plan which clearly identifies all activities associated with this project. This CPM should also establish timeframes and completion dates for all activities.

Finally, Region 9 suggests that the SRPMIC begin the development and implementation of a groundwater investigation to characterize, early in the process, any potential problems associated with past operations. While at this point this requirement may be voluntary, if the landfill receives waste after October 9, 1993, groundwater monitoring would be a requirement of 40 CFR 258.

In closing, Region 9 strongly supports the COE and the SRPMIC in the progress that has been made in addressing this situation. Region 9 will continue to work with the COE and the SRPMIC in developing longer-range solutions to this problem.

If you have any questions, or need any additional information, please contact Jim Vreeland at 415/744-2096.

Sincerely,


for Harry Seraydarian, Director
Water Management Division

cc: COL R.L. VanAntwerp, COE
Steve Johnson, ADEQ